

Subject Access Request Policy



1 Introduction

- 1.1 Under the General Data Protection Regulation (GDPR), you have a right to receive confirmation that an organisation processes your personal data, and also a right to access that data so that you may be aware of it and are able to verify the lawfulness of the processing. The process for doing so is called a subject access request and this policy sets out the procedure to be undertaken when such a request is made by you regarding data processed about you by the Eat That Frog Group.
- 1.2 This policy applies to current and former employees, workers, volunteers, apprentices and consultants. This policy relates to the information held by the Company and also any personal data that may be held by data processors (service providers) where they are processing information on the Company's behalf.

2 Making a Subject Access Request

- 2.1 Subject access requests must be made in writing and can be made in either hard copy format or electronically [a Subject Access Request Form is available for you to complete]. Including specific details of the data you wish to see in your request will enable a more efficient response from the Company. We may need to contact you for further details on your request if insufficient information is contained in the original request.
- 2.2 Requests may be made by you personally or by a third party eg a solicitor acting on your behalf. We will request evidence that the third party is entitled to act on your behalf if this is not provided at the same time as the request is made.

3 Upon Receiving a Subject Access Request

- 3.1 The Company will comply with your request without delay and at the latest within one month unless one of the following applies:

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- if it is subject to legal privilege or relates to management planning. If so, the Company will inform you that your request cannot be complied with, and an explanation of the reason will be provided.
- we require extra time because the requests are complex or numerous. If so, the Company will write to you within one month of receipt of your request to explain why an extension is required. Where an extension is required, information will be provided within three months of the request.

3.2 Before supplying the data (where appropriate) we may contact you asking for proof of identity. You must produce this evidence for your request to be complied with.

3.3 Your request will normally be complied with free of charge. However, we may charge a reasonable fee if the request is manifestly unfounded or excessive, or if it is repetitive. In addition, we may charge a reasonable fee if you request further copies of the same information. The fee charged will be based on the administrative cost of providing the information requested.

4 Refusing a Request

4.1 The Company may refuse to comply with a subject access request if it is manifestly unfounded or excessive, or if it is repetitive. In these circumstances, we will write to you without undue delay and at the latest within one month of receipt to explain why we are unable to comply. You will be informed of the right to complain to the Information Commissioner and to a judicial remedy.

5 Review

5.1 This policy does not form part of your contract of employment (or contract for services if relevant) and can be amended by the Company at any time. It is intended that this policy is fully compliant with the 2018 Act and the GDPR. If any conflict arises between those laws and this policy, the Company intends to comply with the 2018 Act and the GDPR.

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5.2 History of policy changes:

| Date | Page | Details of the change | Agreed By |
|-----------------------|------|-----------------------|-----------|
| 11/06/18 | ALL | New Policy | BOD |
| June 2021 | All | Reviewed – no change | BOD |
| June 2022 | All | Reviewed – no change | Board |
| June 2023 | All | Reviewed – no change | Board |
| Next review June 2024 | | | |